

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION**

TODD JANSON, GERALD T. ARDREY, CHAD M.  
FERRELL, and C & J REMODELING, on behalf of  
themselves and on behalf of all others similarly situated,

Plaintiffs,

v.

LEGALZOOM.COM, INC.,

Defendant.

Case No. 2:10-cv-04018-NKL

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**UNOPPOSED MOTION TO FILE DOCUMENT UNDER SEAL**

Defendant LegalZoom, Inc. (“LegalZoom”), respectfully requests that the Court grant LegalZoom leave to file under seal the Declaration of Edward R. Hartman submitted as a separate part of LegalZoom’s Notice of Removal (“Hartman Declaration on Removal”). The Hartman Declaration on Removal contains proprietary trade secrets and confidential commercial information.

1. On December 17, 2009, Plaintiff Todd Janson commenced this action by filing a petition against LegalZoom in the Circuit Court of Cole County, Missouri, captioned *Todd Janson on behalf of Himself and all Missourians similarly Situated v. LegalZoom, Inc.*, No. 09AC-CC00737. On January 15, 2009, Mr. Janson and additional Plaintiffs Gerald T. Ardrey, Chad M. Ferrell and C & J Remodeling LLC filed an Amended Class-Action Petition captioned *Todd Janson, Gerald T. Ardrey, Chad M. Ferrell and C & J Remodeling LLC, on behalf of themselves and on behalf of all others similarly situated v. Legalzoom.com, Inc.*, No. 09AC-CC00737 (“Amended Petition”). In the Amended Petition, Plaintiffs seek to represent a class

consisting of “[a]ll persons or entities in the state of Missouri that paid fees to LegalZoom for the preparation of legal documents from December 18, 2004 to the present.”

2. On February 5, 2010, LegalZoom timely removed the case to this Court. This Court has jurisdiction over the Amended Petition pursuant to the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1332(d).

3. On February 3, 2010, Edward R. Hartman, LegalZoom’s Chief Strategy Officer, executed the Hartman Declaration on Removal, in which he provided, based on personal knowledge, information demonstrating that the amount in controversy over the five-year period applicable to the case exceeds the \$5,000,000 required by CAFA, and that the number of Missouri residents who paid fees to LegalZoom over that period exceeds the 100 represented persons required by CAFA.

4. As is set forth more fully in the accompanying Suggestions in Support of Unopposed Motion to File Under Seal, the information contained in the Hartman Declaration on Removal is proprietary and confidential to LegalZoom and constitutes LegalZoom’s trade secrets and confidential commercial information.

5. Federal Rule of Civil Procedure 26(c)(1)(G) empowers district courts to protect trade secrets and other proprietary and confidential commercial information from disclosure to third parties. Among the ways such information is protected is to permit it to be filed under seal.

6. The Hartman Declaration on Removal contains information of the type commonly protected by Rule 26(c)(1)(G).

7. Counsel for Plaintiffs does not oppose this motion.

WHEREFORE, LegalZoom respectfully requests that the Court grant LegalZoom leave to file the Hartman Declaration on Removal under seal.

Dated: February 5, 2010

Respectfully submitted,

**BRYAN CAVE LLP**

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### **CERTIFICATE OF SERVICE**

I hereby certify that on February 5, 2010, the foregoing was served by overnight mail on the individuals listed below and electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all counsel of record.

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